

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**STIPULATED MOTION TO EXTEND EXPERT DISCOVERY DEADLINE**

The Parties respectfully move to amend the scheduling order to extend the expert discovery deadline from October 4, 2024 to October 14, 2024.

1. Under the present schedule, the expert discovery deadline is October 4, 2024.

2. The Parties have completed the expert depositions of Professor Robert Silverman and Dr. David Banks. The Parties have also agreed to the scheduling of the expert deposition of Michael Gennaco on October 4.

3. Due to illness of one of the witnesses and unforeseen scheduling conflicts, the Parties are unable to complete the expert depositions of Dr. David Bjerk and Steven Nigrelli before the October 4 expert discovery deadline. The Parties have agreed to the scheduling of Dr. Bjerk's deposition on October 8 and Mr. Nigrelli's deposition on October 11. To allow sufficient time for the Parties to complete these two remaining expert depositions, the Parties respectfully request that the Court extend the expert discovery deadline.

WHEREFORE, the Parties respectfully request that the Court modify the schedule as proposed.

Dated: October 2, 2024

Respectfully Submitted,

/s/ Jordan Joachim

Claudia Wilner  
Edward Krugman  
Anjana Malhotra  
NATIONAL CENTER FOR LAW  
AND ECONOMIC JUSTICE  
50 Broadway, Suite 1500  
New York, NY 10004  
212-633-6967  
wilner@nclcj.org  
krugman@nclcj.org  
malhotra@nclcj.org

/s/ Peter A. Sahasrabudhe

Hugh M. Russ III  
Peter A. Sahasrabudhe  
Cheyenne Freely  
HODGSON RUSS LLP  
The Guaranty Building  
140 Pearl Street – Suite 100  
Buffalo, New York 14202  
Telephone: (716) 856-4000  
hruss@hodgsonruss.com  
pshasra@hodgsonruss.com  
cfreiely@hodgsonruss.com

Philip Irwin (*pro hac vice*)  
Jordan Joachim (*pro hac vice*)  
Christine Nelson (*pro hac vice*)  
Andrew Timmick (*pro hac vice*)  
COVINGTON & BURLING LLP  
620 Eighth Avenue  
New York, NY 10018  
212-841-1000  
pirwin@cov.com  
jjoachim@cov.com  
cnelson@cov.com  
atimmick@cov.com

*Attorneys for Defendants*

Matthew Alan Parham  
WESTERN NEW YORK LAW CENTER  
Cathedral Park Tower  
37 Franklin Street, Suite 210  
Buffalo, NY 14202  
716-828-8415  
mparham@wnylc.com

Chinyere Ezie  
Bahir Azmy  
CENTER FOR CONSTITUTIONAL RIGHTS  
666 Broadway, 7<sup>th</sup> Floor  
New York, NY 10012  
212-614-6475  
cezie@ccrjustice.org  
bazmy@ccrjustice.org

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2024, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

*/s/ Jordan Joachim*